

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

IN RE:

**ATRIUM MEDICAL CORP. C-QUARTER
MESH PRODUCTS LIABILITY
LITIGATION**

MDL NO. 2753

MDL Docket No. 1:16-md-02753-LM

Applies to All Cases

**JOINT MOTION TO EXTEND DEADLINES SET FORTH
IN CASE MANAGEMENT ORDER 3H**

The parties to the above matter jointly move to extend the deadlines set forth in Case Management Order 3H, and state as follows:

1. As indicated in the parties' Joint Agenda submitted to this Court for the March 14, 2019 status conference (Doc. No. 1090), the parties require additional time to complete the depositions of the physicians for the Initial Discovery Pool plaintiffs; motions to dismiss the initial discovery pool plaintiffs are pending; initial discovery regarding the newly selected Initial Discovery Pool Case (Petersen) continues; and a replacement for Vanwezel and complete initial discovery as to that plaintiff needs to be completed.

2. The parties have conferred and agree to extend the following deadlines by 90 days.

Event	Current Date	New Date
Selection of 8 cases from Initial Discovery Pool to proceed with expert discovery	April 1, 2019	July 1, 2019
All corporate and case-specific discovery for trial pool cases to be completed	May 3, 2019	August 1, 2019
Plaintiff's expert disclosure due in trial pool cases	June 3, 2019	September 3, 2019
Defendant's expert disclosure due in trial pool cases	July 12, 2019	October 11, 2019

Memorandum in support of proposed manner of trial, order of selection of plaintiffs for trial, and timing of trials re: trial pool cases due	August 2, 2019	October 31, 2019
Rebuttal expert reports due in trial pool cases	August 9, 2019	November 7, 2019
Responses to opposing party's memorandum due	August 16, 2019	November 14, 2019
Court to determine manner of trial, order of selection of plaintiffs for trial, and timing re: trial pool cases	August 30, 2019	December 2, 2019
Expert discovery deadline in trial pool cases	September 20, 2019	December 19, 2019
Dispositive or Daubert motions due re: trial pool cases	October 18, 2019	January 16, 2020
Responses to dispositive or Daubert motions due re: trial pool cases	November 1, 2019	January 30, 2020
Replies to dispositive or Daubert motions due re: trial pool cases	November 8, 2019	February 6, 2020
Deadline for Settlement conference for first trial pool case	January 6, 2020	April 6, 2020
Court to set first trial pool case for trial	February 19, 2020	May 20, 2020

3. No memorandum of law is necessary as the relief requested herein is in the discretion of the Court. LR 7.1(a).

WHEREFORE, the parties respectfully request that this Honorable Court grant this Joint Motion to Extend Deadlines as set forth above, and grant such other and further relief as is fair and just.

Respectfully submitted,

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Date: April 18, 2019

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CERTIFICATE OF SERVICE

I hereby certify that on this day I forwarded a copy of the within document via the Court's ECF system to all counsel of record.

/s/ Russell F. Hilliard
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